

BUMED INSTRUCTION 6470.20

From: Chief, Bureau of Medicine and Surgery
To: Ships and Stations Having Medical Department Personnel

Subj: RADIOACTIVE MATERIAL PERMIT PROGRAM FOR MEDICAL USE

Ref: (a) OPNAVINST 6470.3
(b) Atomic Energy Act, section 91B of 1954
(c) Executive Order 12344 of 1 Feb 82
(d) NAVMEDCOMINST 6470.7A
(e) Title 10, CFR, Part 35 (10 CFR 35)
(f) NAVMED P-5055, Radiation Health Protection Manual
(g) SECNAVINST 5214.2B

1. Purpose. To prescribe procedures and responsibilities for use and control of Nuclear Regulatory Commission (NRC) licensed and other radioactive material used at naval Medical Department activities.

2. Cancellation. NAVMEDCOMINST 6470.7A.

3. Scope. Applies to all naval Medical Department activities engaged in training, calibration, diagnostic or therapeutic procedures, research studies, or in-vitro studies using NRC regulated radioactive byproduct material, special nuclear material, source material, or naturally occurring or accelerator produced radioactive materials.

4. Background

a. In March 1987, the NRC granted Navy a License of Broad Scope for use and control of NRC-licensed radioactive materials at Navy and Marine Corps commands where the NRC has regulatory jurisdiction. The License of Broad Scope authorized the Navy Radiation Safety Committee, established by reference (a), to exercise control of NRC-licensed material used in the Navy and Marine Corps and to issue Navy radioactive material permits authorizing individual commands use of the material. The specific conditions for use of the material are in the terms of the permit. Reference (a) also included, under the cognizance of the Navy Radiation Safety Committee, the use and control of naturally occurring and accelerator produced radioactive material.

b. The Navy Environmental Health Center (NAVENVIRHLTHCEN) was designated as the technical support center to coordinate the Permit Program for naval Medical Department activities. The

BUMEDINST 6470.20
28 Feb 91

Radiological Affairs Support Office (RASO) of Naval Sea Systems Command (NAVSEASYS COM) (SEA 06GN) was designated as the technical support center to coordinate the Permit Program for all other activities. Radioactive materials transferred from the Department of Energy to the Department of Defense per reference (b) and radioactive materials produced as a consequence of the construction, operation, servicing, or maintenance of Naval Nuclear Propulsion Plants per reference (c), the Navy Nuclear Propulsion Program, were not included under the cognizance of the committee.

c. Reference (d) tasked the commanders of geographic naval medical commands (GEOCOMS) (all echelon 3 medical commands) with the responsibility for the use of radioactive material within their geographic regions. This tasking included the oversight and review of the GEOCOM subordinate commands for compliance with the terms of the Permit and Navy radiation health directives. The GEOCOM commanders drew upon the technical expertise resident in the subordinate commands to perform these functions. Usually the senior radiation health officer in the geographical region coordinated the performance of x-ray surveys, NRC License compliance, technical assists, and inspections by the radiation health officers assigned throughout the geographical region. With the reorganization of the naval Medical Department and the disestablishment of the GEOCOMS, this chain of command is no longer applicable.

5. Discussion

a. Commanding officers are tasked with the responsibility for the use of radioactive material at their activities and compliance with the terms of the Permit and Navy radiation health directives.

b. NAVENVIRHLTHCEN and its Navy environmental and preventive medicine units (NAVENPVNTMEDUs) and disease vector ecology control centers (NAVDISVECTECOLCONCENS) are tasked with the responsibility for coordinating requests for x-ray surveys, technical assists, and inspections in their geographical areas.

c. An annual Permit audit requirement is added for compliance with reference (e).

6. Responsibility

a. The NAVENVIRHLTHCEN:

(1) Provides guidance for Navy and Marine Corps medical and dental activities in the preparation of requests for Navy Radioactive Material Permits (NRMP).

BUMEDINST 6470.20
28 Feb 91

(2) Reviews requests for completeness and compliance with current regulations.

(3) Submits NRMPs to the Executive Secretary of the Navy Radiation Safety Committee for action.

(4) Performs inspections to assess compliance with current Navy and Federal regulations and provisions of specific Permits.

(5) Reports the results of the inspections to the Navy Radiation Safety Committee.

(6) Provides educational and training materials, updates on changes in the regulations, summaries of inspection findings, and copies of NRC notices.

(7) Sponsors short courses and seminars on radiation safety related to the conditions of the NRMPs.

(8) Provides technical assistance to permittees as appropriate, e.g., upon the request of the commanding officer holding the Permit to manage

an unusual situation where the need exceeds the technical expertise or other local resources. Appropriate assist situations include instances such as recovery from a fire involving the spread of contamination, recovery from a major spill, or loss of control of radioactive material resulting in the closure of a clinic or ward and release of radiological spaces or facilities for unrestricted use. Technical assistance visits must be conducted in such a manner as not to constitute a conflict of interest with NAVENVIRHLTHCEN's inspection responsibility.

(9) Ensures that Chief, Bureau of Medicine and Surgery (BUMED) is informed of all compliance issues related to the medical Permits.

b. Acting in the behalf of NAVENVIRHLTHCEN, the NAVENPVNTMEDUs and NAVDISVECTECOLCONCENS coordinate the providing of radiation health services required by, and beyond the capabilities of, supported medical treatment facilities (MTFs). Upon requests from supported MTFs, the NAVENPVNTMEDUs and NAVDISVECTECOLCONCENS locate the necessary radiation health resources and coordinate the providing of the necessary services to ensure compliance with the NRMPs.

c. Commanding officers and officers in charge:

(1) Ensure the command has an NRMP before the possession or use of radioactive material.

BUMEDINST 6470.20
28 Feb 91

(2) Ensure compliance with the conditions of the NRMP and instructions concerning the safe receipt, possession, distribution, use, transportation, transfer, and disposal of radioactive material.

(3) Comply with Department of Navy policy of maintaining personnel exposure as low as reasonably achievable.

(4) Maintain an effective radiation protection program as outlined in reference (f).

(5) Conduct an annual audit to ensure compliance with the terms of the Permit. For facilities inside of the continental United States (CONUS), the audit must be conducted by someone independent of the command. For activities outside of the continental United States (OCONUS), the audit must be conducted by someone as independent of the Permit as possible, i.e., the radioisotope user cannot conduct a self audit nor is it mandatory for an activity to fund a radiation health officer from a CONUS activity to conduct the audit. Retain a copy of the audit report for 3 years for review. Forward a copy to NAVENVIRHLTHCEN. This audit, when reviewed by the command's Radiation Safety Committee with the help of the radiation safety officer, can be considered an annual review which meets the requirements of reference (e).

(6) Make radiation health officers available when requested by the NAVENPVNTMEDUs, NAVDISVECTECOLCONCENS, or NAVENVIRHLTHCEN to support other NRMPs in the area. If a commanding officer or officer in charge deems such support of other Permit holders is hazardous to their own command responsibilities, refer the matter to BUMED (MED-02) for resolution.

7. Action. Naval Medical Department activities using radioactive material must comply with reference (a) and this instruction.

8. Report Exemption. The requirements contained in paragraph 6 are exempt from reports control by reference (g), part IV, paragraph G8.

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